

1 JUDGE CHACHKIN: Bureau Exhibit 392 is received.  
2 (Whereupon, the document previously  
3 marked for identification as Media  
4 Bureau Exhibit 392 was received into  
5 evidence.)

6 JUDGE CHACHKIN: And we move to the final volume.  
7 (Pause.)

8 JUDGE CHACHKIN: 407, which is an annual meeting of  
9 the board of directors of the Trinity Christian Center of  
10 Santa Ana, Inc., and affiliated corporations. The document  
11 will be received.

12 (Whereupon, the document previously  
13 marked for identification as Bureau  
14 Exhibit 407 was received into  
15 evidence.)

16 JUDGE CHACHKIN: 410, do you object to 410?

17 MR. TOPEL: Not, not subject to their being tied up,  
18 Your Honor. I assume the Bureau plans on attempting to tie  
19 those up and, and subject to that representation, I have no  
20 objection.

21 MR. SHOOK: We'll certainly try.

22 JUDGE CHACHKIN: Bureau Exhibit 410 is received.  
23 (Whereupon, the document previously  
24 marked for identification as Bureau  
25 Exhibit 410 was received into

1 evidence.)

2 JUDGE CHACHKIN: Bureau Exhibit 5 -- no, Bureau  
3 Exhibit -- are there any more?

4 MR. TOPEL: No, I think that's it.

5 JUDGE CHACHKIN: Is that it? We ready for our first  
6 witness, is that --

7 MR. COHEN: Well, we have two more matters.

8 JUDGE CHACHKIN: Two more?

9 MR. COHEN: Yeah, I want to offer the Miller  
10 deposition, and then I wanted to ask you if you would revisit  
11 the --

12 JUDGE CHACHKIN: All right. All right, we're  
13 finished with the Bureau exhibits. All right, Mr. Cohen.

14 MR. COHEN: I'd like to offer, Your Honor, what I  
15 believe already has been handed to the reporter and to the  
16 parties. I don't happen to have a copy of it. Can I borrow  
17 your -- from the reporter? Your Honor, this is a -- this is  
18 the deposition testimony of one Warren Benton Miller, II, and  
19 it's being offered pursuant to stipulation that we've entered  
20 into. What's my next exhibit number, Your Honor? I forgot to  
21 write the number.

22 JUDGE CHACHKIN: 210, I believe.

23 MR. COHEN: 210?

24 JUDGE CHACHKIN: I believe so. 210, yes.

25 MR. COHEN: Okay. This will be marked for

1 identification then as Glendale Broadcasting Company Exhibit  
2 No. 210, which is, as I understand it, coming in on a  
3 stipulated basis. I am offering that document.

4 JUDGE CHACHKIN: The document described is marked  
5 for identification as Glendale Exhibit 210.

6 (Whereupon, the document referred to  
7 as Glendale Exhibit 210 was marked  
8 for identification.)

9 JUDGE CHACHKIN: And I gather there's no objection?

10 MR. TOPEL: That's correct, Your Honor.

11 JUDGE CHACHKIN: Glendale Exhibit 210 is received.

12 (Whereupon, the document previously  
13 marked for identification as Glendale  
14 Exhibit 210 was received into  
15 evidence.)

16 MR. COHEN: Could we turn to that other matter,  
17 Your Honor?

18 JUDGE CHACHKIN: Yes.

19 MR. COHEN: Your Honor, during the few minutes that  
20 I've had, I've identified documents 157, 158, 159, 160, 161,  
21 162, and 163. They're all of the same genre, and for purposes  
22 of argument, I, I would ask you to look at -- well, I, I  
23 would -- I'm just trying to find one that I think you'll -- is  
24 best for your purposes for, for hearing arguments. I ask you  
25 to look at Exhibit No. 159. Now, my argument, Your Honor, is,

1 is as follows, and it's a, it's a short one. Authentication  
2 ought not to be a problem, and I'm prepared to address that if  
3 you wish. The federal rules are very clear on this. You do  
4 not need a sponsoring witness to authenticate a document.  
5 That's for sure.

6 JUDGE CHACHKIN: Well, this one's signed by  
7 Ben Miller, so --

8 MR. TOPEL: Yeah, and, Mr. Cohen, you gave --

9 MR. COHEN: But I have a list.

10 MR. TOPEL: You gave a list 157, 158, 160, 162 and  
11 163, and then you turned to 159. Is, is 159 --

12 MR. COHEN: Well, okay, I'll, I'll use -- that was  
13 carelessness on my part. We can go, we can go, we can go to  
14 160. That's, that's fine.

15 JUDGE CHACHKIN: All right.

16 MR. COHEN: Okay, now, so authentication is not an  
17 issue. The fact that a document is signed or not signed, I  
18 submit to you, doesn't go to its admissibility when you  
19 recognize the context, and the rules in the cases construing  
20 the federal rules are clear on that. These -- this document  
21 has a number on the bottom, 50527. This document came from  
22 the files of Trinity and/or NMTV. There has been no argument  
23 made to Your Honor that this document is not genuine in the  
24 sense that it didn't come from the files of NMTV or Trinity,  
25 so you should assume, I, I respectfully submit, for purposes

1 of ruling that this is a true document. The fact that it's  
2 not signed, if anything, goes to its weight. Documents in  
3 files frequently are not signed because of the internal  
4 procedures of a, of an organization. This didn't come from  
5 Darlene Eve's files; this came from Trinity's files. Now,  
6 insofar as the contents of the document are concerned, I think  
7 the law is clear I can offer it as an admission and it would  
8 be -- if it for a hearsay purpose, for the truth of the  
9 proposition asserted -- but I'm not asking you to accept it  
10 for that. I'm asking you to accept it for the proposition  
11 that Ben Miller said that "we have two surplus Sony 58  
12 machines here at TBN facility which I will have sent to you."  
13 The fact that he said that is definitely relevant on both --  
14 under both issues, and that's my argument, and there is a  
15 series of documents. What I was urging earlier was that they  
16 didn't have to come in for the truth of the proposition  
17 asserted, and I don't think I made my argument clear, and for  
18 that I apologize to Mr. Topel. There was no intent on my part  
19 to mislead you, and I thank you for the opportunity to revisit  
20 this.

21 MR. TOPEL: Yes.

22 JUDGE CHACHKIN: All right, Mr. Topel, he's arguing  
23 that the representation itself is relevant.

24 MR. TOPEL: Okay, I -- well --

25 JUDGE CHACHKIN: And --

1 MR. TOPEL: I don't think the representation is  
2 relevant, although I understand Your Honor may, may wish to  
3 have that representation if it could be established that this  
4 document was sent, and if Mr. Miller had an opportunity to  
5 explain what he meant by it. What Mr. Cohen wants to do is,  
6 is use documents to impugn witnesses who haven't had a chance  
7 to explain them, and Mr. --

8 JUDGE CHACHKIN: Well, if my --

9 MR. TOPEL: -- Miller, Mr. Miller was available for  
10 deposition and Mr. Cohen examined him about scores of  
11 documents which have come into the record because Mr. Miller  
12 authenticated them. However, his deposition also showed that  
13 there were several documents that he couldn't authenticate,  
14 even though they looked just like this one, and so my  
15 agreement with Mr. Cohen was that anything that Mr. Miller  
16 authenticated, or anything that he, he signed so I knew that  
17 it was a document that happened, I wouldn't object to, but I  
18 don't know if Mr. Cohen asked Mr. Miller about this document  
19 if Mr. Miller would say, you know, "it was never sent," or  
20 what he would say, or what he would say it meant; and so I  
21 think it, it is, is dangerous in an evidentiary manner to, to  
22 receive documents that we don't know -- that there's no  
23 examination about, and Mr. Cohen, as you indicated, had the  
24 right to call Mr. Miller. He didn't. As you indicated, he's  
25 left with cross-examination, and we have agreed to every

1 document that we could determine that Mr. Miller authentica-  
2 ted, but there were documents that looked like this that he  
3 couldn't authenticate, and so I don't, I don't know.

4 MR. COHEN: Could I be heard on that?

5 JUDGE CHACHKIN: Yes.

6 MR. COHEN: First of all, Your Honor, if this was a  
7 document, and I don't believe that's the case, if this was a  
8 document that Mr. Miller could not authenticate, then his  
9 deposition will reflect that and my -- and this admitting it  
10 into evidence will be of no value if Mr. Miller has testified  
11 that he didn't write this, or he, or he explains it away, or  
12 something, and Mr., Mr. Topel has nothing to fear.

13 MR. TOPEL: He wasn't asked about it.

14 MR. COHEN: Approximately 30,000 documents, Your  
15 Honor, were exchanged in discovery, and our law firm is a  
16 small law firm of, of three lawyers, and we have very limited  
17 resources. I examined to the best of my ability every  
18 document I could prior to the deposition, but I wasn't  
19 physically able to examine every document myself before the  
20 depositions took place. You put us on a very tight timetable  
21 as you're aware, so I don't think that's, that's a proper  
22 objection. The point is, Your Honor, Mr. Topel is reading  
23 into the rules of evidence something that doesn't exist. If  
24 Mr. Miller was here, for example, I could offer this document  
25 to him and I wouldn't have to ask him one question about the

1 document. There's no requirement, Your Honor, under the rules  
2 of evidence that you give a witness an opportunity to explain  
3 a document. That -- Mr., Mr. Topel is suggesting that somehow  
4 for a document to be admissible, Mr. Miller has to have the  
5 opportunity to explain it away. That is a novel theory and  
6 there is no case support for that. This is a document that  
7 meets the authentication requirements of the federal rules;  
8 it's relevant; and it's not being offered for hearsay purpose.  
9 Then I submit to you, on those bases, these are documents that  
10 should be admitted.

11 MR. TOPEL: Well, Your Honor, I don't -- I have the  
12 federal rule in front of me and, and I don't see any provision  
13 that supports Mr. Cohen's position that you don't have to at  
14 least establish that a document on which you're relying is a  
15 document that actually was, was sent by the parties who are  
16 shown on the document, and Mr. --

17 JUDGE CHACHKIN: It certainly was prepared by  
18 Mr. Miller, you would concede that.

19 MR. TOPEL: Oh, absolutely. I'm sure, I'm sure it  
20 was.

21 JUDGE CHACHKIN: So whether it was sent or not, I  
22 don't know if -- well --

23 MR. TOPEL: The point is that --

24 JUDGE CHACHKIN: The fact that it was prepared and  
25 the fact that it had certain instructions by itself may be



1 relevant.

2 MR. COHEN: That's what's clear, Your Honor.  
3 Whether it was sent is really irrelevant; it's what he said.

4 JUDGE CHACHKIN: Well, if that's the case, then  
5 certainly the fact that it was prepared by him, and the  
6 instructions --

7 MR. COHEN: Exactly, that's my --

8 JUDGE CHACHKIN: -- would be relevant.

9 MR. COHEN: That's all I'm arguing, nothing more.

10 MR. TOPEL: Even, even if it were never sent? You  
11 know, that gets to the issue of, of control. It's -- you  
12 know, there's nothing hidden in this, in this record that the  
13 Trinity Network made its engineering staff available to  
14 National Minority. It's in Mrs. Duff's testimony; it's in  
15 Mr. May's testimony; it's in Dr. Crouch's testimony. You  
16 know, so there's, there's nothing dramatic that that was done,  
17 and there, there is a lot of evidence in the record that I  
18 haven't objected to. It just -- there, there, there comes a  
19 point where, where, where the rules of evidence have to  
20 control the kinds of inferences that a party wants to put into  
21 the record, and Mr. Cohen had the opportunity to have  
22 Mr. Miller explain and authenticate this document at his  
23 deposition; he had the opportunity to notice him as part of  
24 his direct case to get this evidence admitted the proper way.  
25 Your Honor offered him the opportunity to subpoena Mr. Miller,

1 you told him you would sign a subpoena, and he basically is,  
2 is trying to get the document in without a proper evidentiary  
3 foundation for Your Honor to rely on this document.

4 JUDGE CHACHKIN: So you -- your position is that the  
5 fact that it was taken from the files of TBN or National  
6 Minority by itself doesn't establish that in fact such a  
7 document was prepared and was sent forward.

8 MR. TOPEL: I, I think it, it certainly establishes  
9 that it was prepared. I don't believe it was -- it  
10 establishes that it was sent forward, and I don't mean to be  
11 representing to you, and I hope Your Honor isn't interpreting  
12 it this way, as saying whether this one did or didn't. I  
13 don't know. Mr. Miller never had an opportunity to explain,  
14 and it would be improper evidentiary -- in an evidentiary  
15 manner to, to rely on a document where there isn't that  
16 foundation testimony.

17 JUDGE CHACHKIN: Well, all right, Mr. Cohen, I could  
18 only receive this document for the fact that it was prepared  
19 by Mr. Miller.

20 MR. COHEN: That's all I'm asking you to do.

21 JUDGE CHACHKIN: I can't receive it -- I can't  
22 accept it, though, for the fact that it was actually sent to  
23 Darlene Eve in the absence of testimony from Mr. Miller.

24 MR. COHEN: Okay, Your Honor, that, that's -- I  
25 understand that.

1 JUDGE CHACHKIN: All right.

2 MR. COHEN: I think that's, that's a reasonable  
3 position.

4 JUDGE CHACHKIN: All right.

5 MR. COHEN: And, and --

6 JUDGE CHACHKIN: If that's true of all the other  
7 documents --

8 MR. COHEN: Well, we can -- I think we --

9 MR. TOPEL: We ought to look at them.

10 MR. COHEN: I don't want to mislead Mr. Topel  
11 because I, I, I --

12 JUDGE CHACHKIN: I mean, it was signed and I don't  
13 think there's any question --

14 MR. TOPEL: I haven't objected to the ones that were  
15 signed, I don't believe.

16 JUDGE CHACHKIN: All right.

17 MR. COHEN: Okay, let me, let me go through the ones  
18 that I had marked, Your Honor.

19 JUDGE CHACHKIN: All right. Okay.

20 MR. COHEN: Because I, I -- at one time I was foggy  
21 and I don't want to be foggy again.

22 (Pause.)

23 MR. COHEN: 161 would fall in the same category,  
24 Your Honor, as 160. It seems to me your ruling would be the  
25 same. It, it also is not signed.

1 JUDGE CHACHKIN: That's correct.  
2 MR. COHEN: 162 -- let's see now, 162 is signed  
3 and --  
4 JUDGE CHACHKIN: Since it was signed --  
5 MR. TOPEL: I don't think -- did I object to that?  
6 MR. COHEN: But I, I may have offered it for a more  
7 limited purpose and now I want to --  
8 JUDGE CHACHKIN: Well, I don't think you did.  
9 MR. SHOOK: You didn't offer it at all.  
10 MR. COHEN: I didn't offer it at all.  
11 JUDGE CHACHKIN: All right, there's, there's no  
12 problem with that at all, then.  
13 MR. COHEN: That's great, all right. Well, I did  
14 this quickly because you said to show you, show you the --  
15 JUDGE CHACHKIN: No, the ones that you're interested  
16 in Mr. Miller -- Mr. Cohen.  
17 MR. COHEN: 163.  
18 JUDGE CHACHKIN: 163.  
19 MR. SHOOK: You didn't offer that.  
20 JUDGE CHACHKIN: Was not offered, all right.  
21 MR. COHEN: I didn't offer that at all? I withdrew  
22 that?  
23 MR. SHOOK: It's identical to Bureau Exhibit --  
24 MR. COHEN: Oh, it's, it's identical, okay. Well,  
25 if you will, if -- I think your ruling is clear, Your Honor.

1 JUDGE CHACHKIN: Well, I've indicated that if it --

2 MR. COHEN: How about 164? What was -- what  
3 happened with 164?

4 MR. SHOOK: Received subject to a limitation.

5 MR. COHEN: Well, there, there would be an example  
6 then of the limitation.

7 JUDGE CHACHKIN: Well, I want to make clear on  
8 those -- in those memos which are not signed --

9 MR. COHEN: Yes.

10 JUDGE CHACHKIN: -- that I am receiving it not only  
11 for the limited purposes showing who the individuals are and  
12 their positions, but also for the fact that it was prepared by  
13 Ben Miller, and the information there is -- was prepared by  
14 Ben Miller.

15 MR. COHEN: Thank you, Your Honor.

16 JUDGE CHACHKIN: Without getting to the truth of the  
17 matter.

18 MR. COHEN: Yes, I'm not -- I have -- then I have  
19 nothing else. I'm prepared to --

20 JUDGE CHACHKIN: All right.

21 MR. COHEN: -- commence examination.

22 JUDGE CHACHKIN: All right. Does that take us now  
23 to the oral testimony?

24 MR. TOPEL: Um-hum, it does.

25 MR. COHEN: Are you going to take a -- it's 2:30.

1 Are you going to take a little break before we start?

2 JUDGE CHACHKIN: Well, if you want to take a little  
3 break before we start --

4 MR. TOPEL: That would be useful, Your Honor, before  
5 she appears.

6 MR. COHEN: That would be good.

7 JUDGE CHACHKIN: All right, we'll take a little  
8 break.

9 MR. TOPEL: How long are we going to take, 10?

10 JUDGE CHACHKIN: We'll take -- this will be our  
11 mid-day break. Then --

12 (Whereupon, a brief recess was taken.)

13 JUDGE CHACHKIN: Let's go on the record. You have  
14 your first witness?

15 MR. TOPEL: Yes, Your Honor. I call to the witness  
16 stand Mrs. Pearl Jane Duff.

17 JUDGE CHACHKIN: All right. Please raise your right  
18 hand.

19 Whereupon,

20 PEARL JANE DUFF

21 having first been duly sworn was called as a witness herein  
22 and was examined and testified as follows:

23 JUDGE CHACHKIN: Please be seated. Go ahead,

24 Mr. Topel.

25

MR. TOPEL: Thank you, Your Honor.

1 DIRECT EXAMINATION

2 BY MR. TOPEL:

3 Q Would you state your full name for the record,  
4 please?

5 A Pearl Jane Duff.

6 Q Thank you. And what is your residence address?

7 A 22156 Tamma Drive.

8 Q City and state, please.

9 A Lake Forest, California, 92630.

10 Q Thank you.

11 MR. TOPEL: Your Honor, the record will reflect that  
12 we have in front of Mrs. Duff four volumes that constitute her  
13 direct case testimony with the portions that, that were  
14 rejected marked out, but there are no other markings on the  
15 documents.

16 BY MR. TOPEL:

17 Q And, Mrs. Duff, I am showing you a document that has  
18 been received into evidence as Trinity Broadcasting of  
19 Florida, Inc./TBF Exhibit 101, and in turning to the page  
20 after page 71 of the document and -- could you tell me, is  
21 that your signature on that page?

22 A Yes, it is.

23 Q And do you affirm that this testimony constitutes  
24 your direct testimony to the Federal Communications Commission  
25 in this proceeding?

1           A     Yes, it does.

2           MR. TOPEL:  Yes, Your Honor, I believe the witness  
3 would now be available for cross-examination.

4           JUDGE CHACHKIN:  Mr. Cohen, are you going to go?

5           MR. COHEN:  Yes, sir.

6           JUDGE CHACHKIN:  All right, go ahead.

7                           CROSS EXAMINATION

8           BY MR. COHEN:

9           Q     Good afternoon, Mrs. Duff.

10          A     Good afternoon.

11          JUDGE CHACHKIN:  You'll have to keep your voice up,  
12 Miss Duff, or else the reporter is going to have difficulty  
13 getting it down.

14          MR. COHEN:  Your Honor, first --

15          JUDGE CHACHKIN:  And the parties are going to have  
16 difficulty hearing you.  Go ahead, Mr. --

17          MR. COHEN:  You alluded before we took testimony the  
18 other day to the fact that we're going to have sequestration  
19 in this, and I would be grateful, Your Honor, if you would --  
20 I'm sure Mr. Topel has instructed the, the witness, and we had  
21 sequestration during the deposition, but I wish for the record  
22 you would make clear to the witness that she's under a  
23 sequestration procedure in terms of, of discussing her  
24 testimony with any other prospective --  
25

          JUDGE CHACHKIN:  That's correct.  Miss Duff, you're



1 not to discuss your testimony with any other witnesses in this  
2 proceeding.

3 MRS. DUFF: I understand.

4 JUDGE CHACHKIN: All right.

5 MR. COHEN: And, Your Honor, during the course of  
6 the deposition, we had a sequestration rule in effect for all  
7 parties, which I would ask you to order in, in effect now,  
8 which went beyond witnesses, that is, no person under the rule  
9 that we had was permitted to inform a witness of questions and  
10 answers -- questions or answers, or testimony of witnesses  
11 that had testified previously, and I would ask you  
12 respectfully to so order that sequestration rule for the  
13 remainder of the, of the evidence to be taken.

14 JUDGE CHACHKIN: Do you have any comments,  
15 Mr. Topel?

16 MR. TOPEL: I, I have no objection to the  
17 sequestration rule. It applies to all parties, doesn't it?

18 MR. COHEN: Of course.

19 JUDGE CHACHKIN: What's the Bureau's view?

20 MR. SHOOK: The Bureau has no problem with that.

21 JUDGE CHACHKIN: Since the parties all agreed to it,  
22 so, so be it.

23 MR. TOPEL: Thank you, Your Honor.

24 JUDGE CHACHKIN: Please proceed.

25 BY MR. COHEN:

1 Q Mrs. Duff, you will recall that your deposition was  
2 taken in this proceeding. My question is, I take it that in  
3 connection with preparing for this testimony you reviewed your  
4 deposition?

5 A Yes.

6 Q And have you had occasion to review the depositions  
7 of other Trinity and NMTV witnesses?

8 A No.

9 Q So you've, you have reviewed no other deposition.

10 A No.

11 Q And have you discussed with any of the other  
12 witnesses who are going to be testifying the testimony that  
13 they will be offering here in Washington?

14 A No.

15 Q Have you seen any other person's testimony in draft  
16 form?

17 A No.

18 Q Did you provide any input or suggestions for any  
19 person's testimony other than your own?

20 A No.

21 Q Subsequent to the time that your deposition was  
22 concluded, have you spoken to Pastor Espinoza about his  
23 testimony or your testimony?

24 MR. TOPEL: Your Honor, I object. There would be  
25 nothing improper if she had.

1 JUDGE CHACHKIN: That's --

2 MR. COHEN: Who said there was anything improper?

3 JUDGE CHACHKIN: Objection is overruled.

4 BY MR. COHEN:

5 Q Do, do you have the question in mind? Let me repeat  
6 that for you --

7 A Please repeat the question, please.

8 Q Sure. Subsequent to the time that your deposition  
9 was concluded, have you had occasion to speak with  
10 Pastor Espinoza about his testimony or your testimony?

11 A Not really.

12 Q Not really?

13 A The fact that we wished each other well, that type  
14 of thing.

15 Q Okay, did you have -- did you talk at all about the  
16 written testimony that you would be offering or that he would  
17 be offering?

18 A No.

19 Q Did you talk at all, and I mean by you, you and  
20 Pastor Espinoza --

21 MR. COHEN: Excuse me, could I move that picture?  
22 It, it, it interferes with me. Without -- would you mind if I  
23 moved it over here, Your Honor?

24 JUDGE CHACHKIN: It's all right.

25

MR. COHEN: Thank you. Thank you, Mrs. Duff, I

1 appreciate that.

2 BY MR. COHEN:

3 Q So you, you, you didn't talk, I take it then, with  
4 Pastor Espinoza about any facet of your written testimony or  
5 his written testimony, that's what you're telling us?

6 A No.

7 Q So I, I, I stated your position accurately, is that  
8 correct, what I just --

9 A I have not -- no, I didn't discuss it.

10 Q Thank you. Now, I take it then that you didn't  
11 refresh Pastor Espinoza's recollection on any information  
12 contained in your testimony or his testimony?

13 A No.

14 Q Now, you became a salaried employee of TBN in -- is  
15 it 1979 or 1980?

16 A 1979.

17 Q And you remained a salaried employee since that  
18 date, is that correct?

19 A That's correct.

20 Q And you don't receive a salary from NMTV, am I  
21 correct?

22 A No.

23 Q And you never have.

24 A No.

25 Q And do you have paid employment other than at TBN?

1 A No.

2 Q At the present time, do any of your family, any of  
3 your relatives, work for TBN?

4 A Yes.

5 Q Will you please tell me who?

6 A My son.

7 Q And what is his name?

8 A Reginald Duff.

9 Q Anyone else?

10 A My daughter-in-law.

11 Q What is her name?

12 A Cheri Duff.

13 Q Anyone else?

14 A No.

15 Q What about your husband?

16 A My husband has never worked for TBN.

17 Q I see. Any other relatives of yours that have  
18 worked for TBN?

19 A Only on a temporary basis.

20 Q And who was that?

21 A My granddaughter.

22 Q And what is her name?

23 A Janie.

24 Q I beg your pardon?  
25

A Janie?

1 Q Janie. Anyone else?

2 A No.

3 Q Now, the persons that you've mentioned, Reginald,

4 Cheri, and Janie, do you mind if I refer to them by their

5 first name?

6 A No.

7 Q Are they currently employed at TBN?

8 A Reggie and Cheri are.

9 Q And for how long has Reggie been employed?

10 A I'm not sure. For about 8 years. I'm not

11 absolutely sure.

12 Q Approximately, that's your best --

13 A Approximately.

14 Q And in what position?

15 A He's had several different positions.

16 Q Could you review them briefly?

17 A He was in the security department and in production.

18 He's worked in various other things but he's primarily under

19 the production department.

20 Q Is that where he's working now?

21 A Yes.

22 Q And what about Cheri?

23 A She's my secretary.

24 Q And how long has she served as your secretary?

25 A For about 4, 4 1/2, 5 years. Four and a half years.

1 Q Has she had any position other than that?  
2 A Yes.  
3 Q What was that?  
4 A She worked in the accounting department prior to  
5 working for me.  
6 Q And Janie?  
7 A She was temporary employed during the telethon.  
8 Q And is she still temporarily employed?  
9 A No.  
10 Q What year was this telethon?  
11 A I think it was this -- early this year, in March.  
12 March --  
13 Q March of 1993.  
14 A Yes, sir.  
15 Q Now, you've mentioned these three persons. Do you  
16 have any other relatives who have been employed in any  
17 capacity for TBN?  
18 A No, not that I can think of.  
19 Q I, I guess I was confused about your husband. Your  
20 husband, has, has he had any official connection with TBN at  
21 all?  
22 A He was on the board of directors of the Florida  
23 corporation at one time.  
24 Q And do you remember when that was approximately?  
25 A Approximately 1980, '81. And --

1 Q And -- excuse me, I beg your pardon. I didn't mean  
2 to cut you off, I apologize. Have you finished your answer?

3 A Yes.

4 Q Okay. Was he -- did he have any other official  
5 connection with TBN other than the one you've just testified  
6 to?

7 A No.

8 Q At the present time, does he have any connection  
9 with TBN?

10 A No.

11 Q Now, your testimony reflects that you are the  
12 administrative assistant to the president of TBN, is that  
13 correct?

14 A Yes.

15 Q And you've served in that capacity for how many  
16 years approximately?

17 A Since 1981, I believe.

18 Q And that's been continuous.

19 A Yes.

20 Q And you report to Paul Crouch, who is the president,  
21 is that correct?

22 A Yes.

23 Q Now, am I correct that Mr. Crouch has another  
24 administrative assistant?

25 A He has at least two others.



1 Q Two others.

2 A At the present time.

3 Q And, and who are they?

4 A Terri Hickey and Ruth Brown.

5 Q And Ruth Brown is the wife of Al Brown.

6 A That's correct.

7 Q And Al Brown is the director of finance.

8 A That's correct.

9 Q And Ruth Brown is, is related to the Crouches, am I

10 correct?

11 A Yes.

12 Q And what is that relationship?

13 A She is Paul Crouch's sister.

14 Q Thank you. Now, Mr. Hickey is an officer of, of

15 some TBN corporations, am I correct?

16 A That's correct.

17 Q And he's -- is he also an officer of NM, NMTV?

18 A Yes.

19 Q Are you an officer of any TBN corporations?

20 A Yes.

21 Q Would, would you state for the record which ones, if

22 you know?

23 A Most of them.

24 Q Okay, give me your best recollection, and I, and I

25 realize your testifying from your memory, so whatever your